

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Re: Docket No. 138

**Final Hearing Date: July 28, 2022 at 10:00 a.m.  
Objection Deadline: July 21, 2022 at 4:00 p.m.**

**NOTICE OF HEARING ON CUSTOMERS BANK'S EMERGENCY  
MOTION SEEKING INTERIM AND FINAL RELIEF REQUIRING  
DEBTORS TO SEGREGATE AND ACCOUNT FOR CASH  
COLLATERAL IN COMPLIANCE WITH 11 U.S.C. § 363(C)(4)**

**TO: ALL PARTIES IN INTEREST**

**PLEASE TAKE NOTICE** that, on July 13, 2022, Customers Bank filed an *Emergency Motion Seeking Interim and Final Relief Requiring Debtors to Segregate and Account for Cash Collateral in Compliance with 11 U.S.C. § 363(c)(4)* [Dkt. 117] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court"), along with a motion requesting an interim hearing on the Motion on shortened notice [Dkt. 118].

**PLEASE TAKE FURTHER NOTICE** that, on July 15, 2022, Customers Bank filed the *Certification of Counsel Regarding (i) Stipulation Pursuant To 11 U.S.C. 363(C)(4) Preserving Status Quo Regarding Customers Bank Cash Collateral; and (ii) Order Approving Stipulation Preserving Status Quo Regarding Customers Bank Cash Collateral*, pursuant to which Customers Bank and debtor First Guaranty Mortgage Corporation resolved the request for interim relief and agreed to preserve the status quo pending a hearing on the Motion (the "Stipulation") [Dkt. 137].

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5400 Tennyson Parkway, Suite 450, Plano, TX 75024.

**PLEASE TAKE FURTHER NOTICE** that, on July 15, 2022, the Bankruptcy Court entered an Order approving the Stipulation [Dkt. 138].

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Stipulation, a final hearing to consider the relief requested in the Motion will be held on **July 28, 2022 at 10:00 a.m. (prevailing Eastern Time)** at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom 7, Wilmington, Delaware 19801 before The Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware.

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the Motion must be filed with the Bankruptcy Court and served, on or before **July 21, 2022 at 4:00 p.m. (prevailing Eastern Time)** to (a) the Debtors; (b) proposed counsel to the Debtors, (i) Dentons US LLP, 601 South Figueroa Street, Suite 2500, Los Angeles, California 90017-5704 (Attn: Samuel R. Maizel and Tania M. Moyron) or by e-mail at [samuel.maizel@dentons.com](mailto:samuel.maizel@dentons.com) and [taniamoyron@dentons.com](mailto:taniamoyron@dentons.com), and (ii) Pachulski Stang Ziehl & Jones LLP, 919 N. Market Street, 17th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 Attn: Laura Davis Jones ([ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)); (c) counsel for the Cash Flow DIP Lender, Greenberg Traurig, LLP Attn: Nancy Peterman ([PetermanN@gtlaw.com](mailto:PetermanN@gtlaw.com)), John D. Elrod ([ElrodJ@gtlaw.com](mailto:ElrodJ@gtlaw.com)), Joseph Davis ([DavisJ@gtlaw.com](mailto:DavisJ@gtlaw.com)), and Danny Duerdoth ([duerdothD@gtlaw.com](mailto:duerdothD@gtlaw.com)); (d) counsel to the official committee of unsecured creditors, if one is appointed; (e) the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Benjamin A. Hackman ([Benjamin.A.Hackman@usdoj.gov](mailto:Benjamin.A.Hackman@usdoj.gov)); and (f) counsel to Customers Bank, Dorsey & Whitney LLP, Attn: Thomas O. Kelly III ([kelly.tom@dorsey.com](mailto:kelly.tom@dorsey.com)), Eric Lopez Schnabel ([schnabel.eric@dorsey.com](mailto:schnabel.eric@dorsey.com)), and Rachel P. Stoian ([stoian.rachel@dorsey.com](mailto:stoian.rachel@dorsey.com)).

**PLEASE TAKE FURTHER NOTICE** THAT IF NO RESPONSES TO THE MOTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR A HEARING.

Dated: July 15, 2022

/s/ Eric Lopez Schnabel  
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*Counsel to Customers Bank*